

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

AUTHORS GUILD, DAVID BALDACCI,  
MARY BLY, MICHAEL CONNELLY,  
SYLVIA DAY, JONATHAN FRANZEN,  
JOHN GRISHAM, ELIN HILDERBRAND,  
CHRISTINA BAKER KLINE, MAYA  
SHANBHAG LANG, VICTOR LAVALLE,  
GEORGE R.R. MARTIN, JODI PICOULT,  
DOUGLAS PRESTON, ROXANA  
ROBINSON, GEORGE SAUNDERS,  
SCOTT TUROW, and RACHEL VAIL,  
individually and on behalf of others similarly  
situated,

Plaintiffs,

v.

OPENAI INC., OPENAI LP, OPENAI LLC,  
OPENAI GP LLC, OPENAI OPCO LLC,  
OPENAI GLOBAL LLC, OAI  
CORPORATION LLC, OPENAI  
HOLDINGS LLC, OPENAI STARTUP  
FUND I LP, OPENAI STARTUP FUND GP  
I LLC, and OPENAI STARTUP FUND  
MANAGEMENT LLC,

Defendants.

No. 1:23-cv-08292-SHS

**AFFIDAVIT OF IAN R. BENSBERG IN  
SUPPORT OF MOTION FOR ADMISSION  
PRO HAC VICE**

I, Ian R. Bensberg, being duly sworn, declare as follows:

1. I am an attorney with the law firm of Lieff Cabraser Heimann & Bernstein LLP.
2. I submit this affidavit in support of my motion for admission *pro hac vice* in the above-captioned matter.
3. I have never been convicted of a felony.
4. I have never been censured, suspended, disbarred or denied admission or readmission by any court.
5. There are no disciplinary proceedings presently against me.

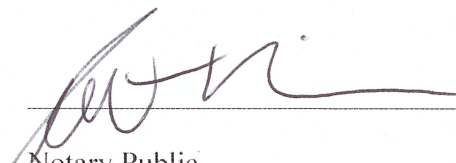
Dated: November 27, 2023

Respectfully submitted,

  
\_\_\_\_\_  
Ian R. Bensberg  
Lief Cabraser Heimann & Bernstein LLP  
275 Battery Street, 29th Floor  
San Francisco, CA 94111  
Telephone: (415) 728-4417  
E-mail: ibensberg@lchb.com

**STATE OF INDIANA  
COUNTY OF MONROE**

Subscribed and sworn before me, a notary public duly qualified and acting in the state  
and county aforesaid, this 27th day of November, 2023.

  
\_\_\_\_\_  
Notary Public

My commission expires:

April 11, 2031

